

INFORMATION NOTE

on the processing of personal data of employees / representatives of contractual partners

1. ABOUT THIS DOCUMENT

VASTINT ROMANIA S.R.L. ("**Vastint**" or "**we**" or "**us**" or other similar names) collects and processes certain categories of personal data in the course of its commercial and financial activities and for purposes relating to the selection, conclusion, management and performance of commercial or contractual relationships. This personal data may belong to employees, representatives, collaborators, other persons designated by Vastint's contractual partners ("**data subject**", or "**you**").

This information notice describes how we process your data and what rights you have.

For any further information regarding the processing of your personal data please use the following email address: info.romania@vastint.eu or the correspondence address in Splaiul Unirii no. 165, TN Offices Building 1, 1st floor, office 1, 030 133, Bucharest.

2. WHAT DATA WE PROCESS ABOUT YOU, PURPOSES AND GROUNDS FOR PROCESSING. STORAGE DURATION

In order to carry out its commercial and financial activities, Vastint may process from data subjects (employees, representatives, collaborators of our contractual partners, other persons designated by the contractual partners) any of the following categories of personal data: names, functions, telephone numbers, e-mail addresses, identification data (including CNP, ID number and series, home address - only to the extent necessary), images captured by video surveillance systems and other data related to access to our premises (only to the extent that you visit Vastint premises), etc.

If you are visiting or working in Vastint buildings or premises, please also refer to the note information note for visitors, available at the reception desk of Vastint buildings (or upon request at the email address mentioned above) for further details on related data processing.

Data is processed for the purposes of complying with obligations laid down by law (including, without limitation, tax and accounting obligations, obligations arising from tendering regulations or health and safety at work), for the execution and administrative management of contracts, including the management of payments and invoices, for the receipt of goods and/or services on our premises, for the management of disputes (if any), for the selection of suppliers and collaborators in relation to Vastint's needs, for internal reporting purposes within the group, for internal audit purposes (security, quality of services, maintenance of financial integrity), etc..

The processing of data for the purposes mentioned above is carried out for the fulfilment of legal obligations (e.g. financial accounting, health and safety, etc.) or may be based on the legitimate interest of Vastint or a third party (e.g. ensuring the security of goods and persons, management of customer and supplier databases, other administrative purposes, etc.) and does not require the consent of the data subjects.

The data will be stored in accordance with the applicable regulations on the protection of personal data for as long as it is necessary for the fulfilment of the aforementioned purposes. Vastint will process the data necessary for the conduct of the business relationship for the duration of the contractual relationship and will store personal data that are necessary to comply with legal and fiscal obligations for the duration required by applicable laws (including, without limitation, the obligation to keep invoices and other documents with financial-accounting value for a period of 10 years).

3. WHO MIGHT HAVE ACCESS TO YOUR DATA.

As part of the processing operations indicated in this Information Notice, personal data may become accessible to **other companies within the Vastint Group** if we consider this to be in our legitimate interest, for internal administrative purposes (e.g. data management in internal IT systems, archiving, etc.) or for auditing and monitoring our internal processes.

This data may also become accessible to the following categories of **third parties**:

- a) companies that provide products and services to us, such as: providers of information technology systems and maintenance of those systems, including email archiving, disaster recovery, cyber security services, etc.;
- b) other entities, such as public authorities, accountants, auditors, lawyers and other external experts and consultants, where their activities require this information;

We will also disclose your personal data to third parties in the following situations:

- a) if you request or agree to this;
- b) persons who can demonstrate that they have the legal authority to act on your behalf;
- c) where it is in our legitimate interest to do so in order to administer, expand or develop the business;
- d) where we are required to disclose your personal data to comply with a legal obligation, any legal request from the authorities;
- e) to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity.

All data transfers/disclosures mentioned above are made in compliance with the principles related to the processing of personal data, in particular the principle of minimization of personal data. Vastint transmits to the third parties indicated above only the personal data that are strictly necessary to achieve the purposes mentioned.

4. TRANSFER OF DATA OUTSIDE THE EUROPEAN ECONOMIC AREA

As a general rule, your data is not transferred by us to recipients outside the European Economic Area (EEA). If this does happen, we will take steps to ensure that the recipient adequately protects your personal information, such as the conclusion of standard clauses approved by the European Commission or the existence of a decision issued by the European Commission on the adequate level of data protection in the recipient's country. As regards recipients who are not under our control (not "data processors" under the GDPR) we cannot guarantee that they will not transfer the data outside the EEA or that, if they do, they will take the necessary measures to adequately protect it.

5. YOUR RIGHTS

As a data subject, you have specific rights related to the personal data we process about you. We will respect your rights and will deal with your requests appropriately.

- 5.1. **Right to information:** your right to receive information on the personal data processing operations carried out by Vastint. Vastint's compliance with this right is hereby acknowledged;
- 5.2. **Right of access:** your right to obtain access to the data processed by Vastint and details of the use of your personal data;
- 5.3. **The right to rectification** your right to obtain from Vastint, without undue delay, the rectification of inaccurate data concerning you or the completion of personal data that are incomplete;
- 5.4. **The right to erasure of data:** You have the right to request that we delete personal data we process about you. We must comply with this request if:
 - a) Personal data are no longer necessary for the purposes for which they were collected;

- b) You object to the processing for reasons relating to your particular situation;
- c) Personal data were processed unlawfully;
- d) Personal data must be deleted to comply with a legal obligation incumbent on us;

unless the data is necessary: for the exercise of the right of free expression and information; to comply with a legal obligation we have; for archiving purposes in the public, scientific or historical interest or for statistical purposes; or for establishing, exercising or defending a right in a court of law.

5.5. **The right to restrict processing** your right to obtain from Vastint the restriction of the processing of personal data in situations expressly provided for in Article 18 of the GDPR.

5.6. **The right to oppose:** Where processing is based on our legitimate interests or those of a third party, you may object at any time to the processing of your personal data on grounds relating to your particular situation. Where the data subject objects to such processing, Vastint shall no longer process the personal data, unless Vastint demonstrates that it has justified grounds for the processing which override the interests, rights and freedoms of the data subject.

To exercise the above rights, you can send a written request using the contact addresses indicated at the beginning of this document.

Upon receipt of the request, Vastint will reply free of charge and without undue delay, and no later than 1 month after receipt of the request. This time limit may be extended, in cases justified by the complexity of the application, by an additional period of up to 2 months.

5.7. **The right to lodge a complaint**

If you have a complaint about the way we process your data, we would prefer that you contact us directly so that we can resolve your issue. However, you can contact the National Supervisory Authority for Personal Data Processing using the form available on the Authority's website: www.dataprotection.ro.

Thank you for reading this document!